

ORIGINAL

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

FILED IN OPEN COURT
U.S.D.C. - Atlanta

JUN 05 2012

JAMES N. HATTEN, Clerk
By:  Deputy Clerk

UNITED STATES OF AMERICA

:

CRIMINAL INDICTMENT

v.

:

NO.

CHARLIE SHIVERS III

:

1 12-CR-181

THE GRAND JURY CHARGES THAT:

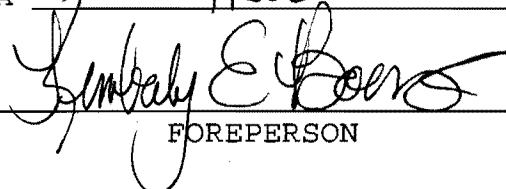
COUNTS ONE THROUGH FIVE

FALSE CLAIMS
(18 U.S.C. §§ 287 and 2)

1. On or about the date listed below in Column B, in the Northern District of Georgia and elsewhere, defendant CHARLIE SHIVERS III, aided and abetted by others known and unknown to the Grand Jury, did cause to be made and presented to a person in the civil service of the United States and to a department and agency thereof, a claim upon and against the United States and a department and agency thereof, specifically, the United States Department of Treasury, Internal Revenue Service, knowing such claim to be materially false, fictitious and fraudulent, specifically, by filing and causing a to be filed a federal income tax return in the name of the company listed in Column C that contained materially false information and that fraudulently claimed a fuel tax refund in the amount listed in Column D for fuel taxes which were never incurred:

A	B	C	D
COUNT	DATE	TAXPAYER	REFUND CLAIMED
1	3/25/10	Flight Line Aviation, Inc.	\$607,790
2	3/31/10	JNC Real Group	\$329,820
3	3/31/10	ZD Technology Systems, Inc.	\$450,086
4	8/3/11	Southard Distributing of Tampa, Inc.	\$326,764
5	8/4/11	Transportation and Distributing Consultants, Inc.	\$538,452


All in violation of Title 18, United States Code, Sections 287 and 2.

A TRUE BILL

FOREPERSON

SALLY QUILLIAN YATES
UNITED STATES ATTORNEY


GALE MCKENZIE

ASSISTANT UNITED STATES ATTORNEY
Georgia Bar No. 494800


ALANA BLACK
ASSISTANT UNITED STATES ATTORNEY
Georgia Bar No. 785945

600 U.S. Courthouse
75 Spring Street, S.W.
Atlanta, GA 30303
(404) 581-6000